

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA**

ALFA LIFE INSURANCE CORPORATION )  
                                          )  
Plaintiff,                          )  
                                          )  
v.                                    )                                          Case No. CV-05-775-MEF  
                                          )  
                                          )  
ADVANTAGE CONSULTING GROUP, INC. )  
and RICHARD E. KNUTSON,          )  
                                          )  
Defendants.                          )

**UNOPPOSED MOTION TO EXTEND DEADLINE FOR THE PARTIES  
TO AMEND THE PLEADINGS AND ADD TO PARTIES**

Defendants Advantage Consulting Group, Inc. (“Advantage”) and Richard E. Knutson (“Knutson”) (hereinafter collectively referred to as “Defendants”), through counsel, request this Court to extend the deadline for the parties to amend the pleadings and add to parties until thirty (30) days after Plaintiff Alfa Life Insurance Corporation (“Alfa”) files a reply to Defendants’ anticipated Answer and Counterclaim. In support of this motion, Defendants state as follows:

1. On or about November 11, 2005, Defendants filed a Motion to Dismiss Counts III and IV Against Advantage Consulting Group, Inc. and Counts I, II, III, and IV Against Richard E. Knutson (“Motion to Dismiss”), which is currently pending before the Court.
2. Defendants intend to file an Answer and Counterclaim within ten (10) days of the Court’s Order on their Motion to Dismiss. Upon receipt of Defendants’ Answer and Counterclaim, Alfa will have twenty (20) days to respond.
3. The parties require a thirty (30) day extension to amend the pleadings and add to parties from the time Alfa files its reply to Defendants’ anticipated Answer and Counterclaim.
4. Alfa’s counsel has no opposition to a thirty (30) day extension of time for the parties to amend the pleadings and add to parties.

WHEREFORE, Defendants request this Court to enter an order granting their request for a thirty (30) day extension of time, from the time Alfa files a reply to Defendants' anticipated Answer and Counterclaim, for the parties to amend the pleadings and add to parties.

Dated this the 1st day of March, 2006.

/s/ J. Forrest Hinton  
J. FORREST HINTON  
ANNE L. WOHLFELD

Attorneys for Defendants Advantage Consulting Group, Inc. and Richard E. Knutson

OF COUNSEL:

BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, P.C.  
A Professional Corporation  
420 North 20th Street, Suite 1600  
SouthTrust Tower  
Birmingham, Alabama 35203-5202  
(205) 328-0480

**CERTIFICATE OF SERVICE**

I hereby certify that on March 1, 2006 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, that all parties are represented by counsel to whom the CM/ECF system will send a Notice of Electronic Filing. Pursuant to Section II(B)(1)(a) of this Court's Administrative Procedures for Filing, Signing and Verifying Pleadings in the District Court Under the Case Management/Electronic Case Files (CM/ECF) System, such notice is the equivalent of service by hand delivery.

Mr. William P. Gray, Jr.  
Mr. Douglas N. Robertson  
Gray & Associates, L.L.C.  
3800 Colonnade Parkway, Suite 545  
Birmingham, Alabama 35243

/s/ J. Forrest Hinton  
OF COUNSEL

